

**Department of Transportation
National Highway Traffic Safety Administration**

**Plan for Increasing the Public Availability
of Information about Agency Operations**

29 February 2016

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Executive Summary

This plan responds to a March 20, 2015 memorandum from the Department of Transportation General Counsel and Chief Information Officer that requires each Operating Administration to develop a specific action plan for making “in demand” information publicly available on an ongoing basis.

This document is a plan that establishes a system under which NHTSA makes appropriate proactive releases of agency information and data. The plan illustrates NHTSA’s existing information disclosure practices, as driven or derived from its core mission and support activities, and then proposes enhancements as opportunities allow.

NHTSA has consistently disclosed information and data to the general public. With the exception of disclosures as a direct result of FOIA requests, this information is released continuously as needed. The agency’s core mission (e.g., program area) activities already result in “proactive” data or information disclosures, often through web-based media. There are two main types of NHTSA activities that include regular releases of information to external parties (i.e., general public, other U.S. government entities or the agency’s various partners in promoting vehicle safety and efficiency):

1. Program-driven Data Releases
2. Executive mandates¹

1.0 Understanding Data in Demand

1.1 Review of Existing Practices

As a current practice, NHTSA identifies information/data in demand for posting by reviewing (a) web analytics for its various web pages, (b) FOIA logs, and (c) public, press, and congressional inquiries to Public Affairs, Governmental Affairs, and individual program offices. These processes are conducted on a continuous basis.

1.2 Improving Current Practices

From a review of existing agency disclosure practices, a factor that could be enhanced is centralizing and facilitating coordination between the agency offices (i.e., FOIA, Communications) that receive requests or capture “demand signals” for agency information with NHTSA offices that function as stewards for this requested information.

Accordingly, NHTSA will:

- **Operationalize engagement with program offices.** NHTSA FOIA, OCCI (Communications) and OCIO will identify potential proactive disclosures by actively

¹ The President's Memorandum on Transparency and Open Government instructed agencies to take specific actions to implement the principles of transparency, participation, and collaboration, and the Office of Management and Budget's (OMB) *Open Government Directive* ² required agencies to expand access to information by making it available online in open formats. The crux of these instructions is for agencies to identify, assess and prepare for release its information that it deems has beneficial value to members of the public and the overall interests of the United States.

engaging with record creators and managers at program offices on a scheduled basis, and can work with those offices to make the posting of the material more efficient. Since 2014, OCIO has engaged program office POCs that have nominated, qualified or published data asset metadata on a quarterly basis—in support of ongoing OST OCIO Open Data inventory requirements. For future inventory activities NHTSA OCIO and/or OCCI will add a proactive disclosure inquiry to program area POCs to facilitate identification and publication of previously unpublished agency data assets that are candidates for proactive disclosure. NHTSA will also incorporate a privacy review of information selected for proactive disclosure to prevent the release of sensitive data. The OCIO data architect will manage this coordination. This process is proposed to begin at the onset of FY16.

- **Use available expertise outside of program areas.** Just as systematically engaging with the program office POCs can assist agency offices such as FOIA and OCCI locate potential proactive disclosures, leveraging other available expertise within the agency (e.g., information area SMEs in record management, data architecture, privacy and communications) or from across the government (such as [Project Open Data](#)) can assist in identifying additional proactive disclosures. The NHTSA data architect, along with OCCI and OCIO record coordinators and privacy officers will engage, as needed, program area record managers and FOIA staff to identify additional proactive disclosures. This process is proposed to begin at the onset of FY16.
- **Increase usage of available tools to support program area engagement.** NHTSA presently leverages MR Tool² as the system that enables easier identification, recording and publication of NHTSA data asset information to the public. Beginning FY16, more agency information area SMEs and program area POCs will use MR Tool directly to log proactive disclosures. The MR Tool was recently upgraded (as of September 2015) with the ability to log data asset privacy data elements, and therefore facilitate the NHTSA privacy officer's assessment of selected proactive disclosures.
- **Consider new technological capabilities**—Besides the use of agency SMEs using the MR Tool to identify proactive disclosures, NHTSA is considering use of reporting and analytics dashboards that would facilitate (a) analysis of log and traffic information collected from the agency's various web pages, (b) FOIA requests, and (c) public, press, and congressional inquiries to Public Affairs, Governmental Affairs, and individual program offices. These tools would introduce an enhanced data-driven process for identifying and selecting in-demand proactive disclosures. This initiative remains in the planning phase.

² The MR Tool is the DOT mandated system for collecting and reporting its data asset information to OMB. This metadata is maintained and updated by both NHTSA OCIO information area SMEs and increasingly by agency program area data stewards or POCs who have expertise into the data asset's contents as well as its statutory and regulatory requirements to be created, maintained, and shared.

The following table lists recent examples of proactive releases of NHTSA information, stemming from improvements to its disclosure practices that resulted in more efficient and/or were responsive to a demonstrated need for the information.

Data Asset Name	Type of Feedback & Recommendations	Response
SAS programs and auxiliary files used in report no. DOT HS 812 069, Lives Saved by Vehicle Safety Technologies & Associated FMVSS, 1960 to 2012 Passenger Cars & LTV's ³	Direct feedback to program office with a telephone call. The caller was a private researcher who requested access to the SAS programs that were used to generate the results of the report. Requester and program office also exchanged some follow-up emails.	In May 2015, NHTSA posted the SAS programs to its public ftp site. A readme document was also included that explained the programs and told in which order to run them. The programs work on the already public FARS files, so there was no need to repost those. However, some auxiliary data sets, derived from FARS public data, were posted that help the programs run. The need to publicize the availability of this dataset to Data.Gov was facilitated by systematic coordination between OCIO and the program area data steward. The metadata was published to Data.Gov in 2015.
Not in Traffic Surveillance (NiTS) ⁴	FOIA request ES14-002529 requested datasets and associated user manuals, which possibly expedited its planned release.	Program released additional datasets and accompanying User Manuals by January 2015. The need to publicize the availability of this dataset to Data.Gov was facilitated by systematic coordination between OCIO and the program area data steward. Updated dataset metadata published to Data.Gov in 2015.
National Survey of Pedestrian and Bicyclist Attitudes, Knowledge, and Behaviors ⁵	FOIA request ES14-001275 requested dataset, which possibly expedited its planned release.	Program released dataset in late 2014. The need to publicize the availability of this dataset to Data.Gov was facilitated by systematic coordination between OCIO and the program area data steward. Updated dataset metadata published to Data.Gov in 2015.

NHTSA will keep the above information, along with other data assets listed in MR Tool, current by reviewing on a scheduled quarterly basis, as part of its existing Data Inventory schedule, or when the information set's data point of contact has progress to report.

³ <ftp://ftp.nhtsa.dot.gov/livessaved/>

⁴ Access point: <ftp://ftp.nhtsa.dot.gov/NiTS/Nontraffic%20crashes/2008/> ; <ftp://ftp.nhtsa.dot.gov/NiTS/Nontraffic%20crashes/2009/>; <ftp://ftp.nhtsa.dot.gov/NiTS/Nontraffic%20crashes/2010/>; <ftp://ftp.nhtsa.dot.gov/NiTS/Nontraffic%20crashes/2011/>; <ftp://ftp.nhtsa.dot.gov/NiTS/Noncrash%20fatalities/2005-2007/2005-2007%20Noncrash%20Fatalities.xlsx>

⁵ Access point: http://www.nhtsa.gov/staticfiles/nti/other/2012survey/BikePed-Data_revFINAL2.csv; http://www.nhtsa.gov/staticfiles/nti/other/2012survey/BikePed-Data_revFINAL2.sav

2.0 Meeting Mandatory Posting Requirements

2.1 Congressional Reports

NHTSA posts Congressional reports in the following way: Congressional reports will be posted within 1 month of finalizing, and will be available at ([NHTSA Reports Sent to Congress](#)) or posted on NHTSA's public website under the Laws & Regulations home page.

2.2 Congressional Testimony

NHTSA posts congressional testimony at its public web site. The NHTSA OCCI is responsible for managing the release of agency Congressional Testimony information, which is published to <http://www.nhtsa.gov/Testimony> and <http://www.nhtsa.gov/Speeches>.

2.3 Freedom of Information Act Request Logs

NHTSA will post a log of its FOIA requests on an annual basis. The FOIA logs will be posted in the NHTSA FOIA Electronic Reading Room under Category 4 – Frequently Requested Records ([http://www.nhtsa.gov/About+NHTSA/NHTSA+Electronic+Reading+Room+\(ERR\)](http://www.nhtsa.gov/About+NHTSA/NHTSA+Electronic+Reading+Room+(ERR))). The NHTSA log of FOIA requests received in FY 2015 will be posted by *October 2015*. NHTSA plans to post these logs at least annually.

2.4 Freedom of Information Act Electronic Reading Room

NHTSA's process for ensuring that statutorily-mandated FOIA Electronic Reading Room records are current (four categories, including "frequently requested records") as outlined in 5 U.S.C. § 552 (a)(2). In accordance with 5 USC 552(a)(2), the following four categories of records ("Reading Room" records) are available without the need for a FOIA request. Only Reading Room records created on or after November 1, 1996, are required to be made available electronically. NHTSA maintains other Reading Room records that can be accessed from the following conventional (paper) Reading Room:

DOT Dockets Office, 1200 New Jersey Avenue, SE, Room W12-140, Washington, D.C. 20590

Hours of Operation: 9-5 ET, Monday through Friday, except Federal holidays. To arrange access, please call telephone (202) 366-9826 or (800) 647-5527. A computer terminal and printer are available at this location for accessing Electronic Reading Room records.

3.0 Considering Additional Items for Posting

3.1 Funding and/or Apportionment Tables

NHTSA posts its funding tables related to its highway safety grants program to <http://www.nhtsa.gov/About+NHTSA/Highway+Safety+Grant+Programs>. NHTSA posts grant

amounts that are recorded in the accounting system as well for its formula and discretionary grants to USASpending.gov.

4.0 Protecting Sensitive Information from Release

NHTSA ensures that private, privileged, or other sensitive data (such as information protected by the Privacy Act or Trade Secrets Act) is not posted on its websites by processes as defined and administered by the NHTSA Privacy Officer. The privacy officer conducts processes that identify and assess agency interfaces, where data and information is disseminated and collected, to determine privacy impact. Additionally, individual agency program areas conduct quality reviews of their datasets and documents mandated for release to parties outside of the agency.